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From: eugene-lamb@nacdn.net.org
Sent: Tuesday, October 05, 2004 12:29 PM
To: FarmBillRules
Subject: CSP Interim Final Rule Comments
Attachments: ATTACHMENT.TXT; NACD Comments on CSP interim final rule 10-05-04.doc

Please see the attached.

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Financial Assistance Programs Division
Natural Resources Conservation Service
P.O. Box 2890
Washington, DC 20013-2890

FarmBillRules@usda.gov

Dear Sir/Madam:

On behalf of the nation's 3,000 conservation districts, I am pleased to submit additional comments from the National Association of Conservation Districts relative to the interim final rule (IFR) for the Conservation Security Program authorized by the Farm Security and Rural Investment Act of 2002. We submitted our initial comments on September 20, 2004.

Again, we applaud NRCS for conducting the first sign-up for the CSP to get the program up and running. Our 118 member districts in the 18 CSP watersheds were substantially involved in the sign-up and we have received feedback from them on how the sign-up went.

Our members have indicated that, in addition to an already comprehensive statute, the interim final rule (IFR) includes too many complicating and limiting features such as establishing categories, defining contract limits more tightly constrained than in the law, and adding a reduction factor to the stewardship payments. These are the three limiting features most often identified by districts.

Many conservation districts also wonder when producers within their boundaries will get a chance to participate in this long-anticipated program since it will be offered in only a few watersheds each year.

While we noted in our earlier comments that soil quality and water quality should not be the only significant resource concerns, the enhancement component of the IFR seems to have enabled producers to address other resource concerns where NRCS was not prepared to do so under the stewardship component alone. In future sign ups as technical tools become more available, we encourage NRCS to address more resource concerns through the stewardship component.

We continue to raise concerns about the limitations addressing forestry issues that are contained in the IFR. We reiterate that it is inappropriate to omit incidental forest land from contracts when it is an incidental part of an overall agricultural operation. On the other hand, we were pleased to learn that as many as 25 percent of the CSP contracts have a wildlife component—a surprise to many.

We appreciate the opportunity to share our additional views and concerns on the CSP interim final rule.

Sincerely,

Bill Wilson

Bill Wilson, Chair, NACD Farm Bill Implementation Committee
President-elect